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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:)	Case No.: 10-71788
JESUS EDGAR MONTANO,)	Chapter 7
Debtor.)	Adversary Case No. 11-4008
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HERITAGE PACIFIC FINANCIAL, LLC.,)	DEFENDANT'S RULE 26(b) MOTION
d/b/a HERITAGE PACIFIC FINANCIAL,)	FOR ADDITIONAL
a Texas Limited Liability Company,)	INTERROGATORIES
Plaintiff,)	
v.)	Hearing Date: March 13, 2013
JESUS EDGAR MONTANO,)	Time: 10.30 AM
Defendant.)	Courtroom: 220
)	Place: 1300 Clay Street
)	Oakland, CA 94612
)	Before Honorable Judge William J Lafferty
)	
)	

Defendant JESUS MONTANO, by and through his counsel, Tessa Meyer Santiago, respectfully moves the Court for leave to serve more than the 25 interrogatories allowed by FRCP Rule 33(a)(1) upon the plaintiff and judgment-debtor, Heritage Pacific Financial, LLC as well as on third parties who have information relevant to the location, nature and extent of

1 Heritage Pacific's financial ability to pay the judgment entered in Defendant Montano's favor on
2 January 25, 2013.

3 This motion is based upon Rules 1, 26(b), 69 (a), and 33(a)(1) of the Federal Rules of
4 Civil Procedure, and upon the other records and documents on file herein.

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6 DATED: 12 February, 2013

Respectfully submitted,

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8 /s/Tessa Meyer Santiago

9 Tessa Meyer Santiago
10 LINCOLN LAW, LLP
11 Attorney for Defendant
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